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Date and Time of Hearing: 2/14/19 at 10:00 a.m.
Objection Deadline: 2/7/19 at 4:00 p.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

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Chapter 11
Case No. 18-23538 (RDD)
(Jointly administered)

**NOTICE OF HEARING ON THE MOTION OF ERIC NATASHA MOORE FOR AN
ORDER FOR RELIEF FROM THE AUTOMATIC STAY PURSUANT TO SECTION 362(d)
OF THE BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on February 14, 2019 at 10:00 a.m. (Prevailing Eastern Time), or as soon thereafter as counsel may be heard, a hearing will be held before the Honorable Robert D. Drain, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601 on the annexed Motion dated January 22, 2019 (the “Motion”) of Erica Natasha Moore (“Movant”), by her counsel Ackerman Fox, LLP for an Order granting relief from the automatic stay pursuant to Section 362(d) of the Bankruptcy Code, to permit Movant to re-file and prosecute her personal injury action (“State Court Action”) against Sears, Roebuck and Co. (“Sears”) and Cleaning Services Group, CSG (“CSG”) in the Superior Court of Lowndes County, State of Georgia, and granting such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion must be (i) made in writing which specifies the name and docket number of this case, the nature of and specific reason for and basis of the objection, the identity of the objecting entity (with address, telephone number, and if available, fax number and e-mail) which conformx to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall be filed with the Bankruptcy Court (a) by attorneys practicing in the Bankruptcy Court, including attorneys admitted pro hac vice, electronically in accordance with General Order M399 (which can be found at www.nysb.uscourts.gov), and (b) by all other parties in interest in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and shall be served in accordance with the Court's Amended Order Implementing Certain Notice and Case Management Procedures, entered on November 1, 2018, on (i) Ackerman Fox, LLP, 90 Merrick Ave., Suite 400, East Meadow, New York 11554, attn.: Neil H. Ackerman, Esq., counsel for Movant, and (iii) Office of The United States Trustee, Attn: Richard Morrissey, 201 Varick St. Ste. 1006, New York, NY 10014, 2018 (Docket No. 405), so as to be filed and received no later than February 7, 2019 at 4:00 p.m., Prevailing Eastern Time (the "Objection Deadline").

PLEASE TAKE FURTHER NOTICE that if no Objections are timely filed and served as set forth above, the relief requested in the Motion may be granted with no further notice or opportunity to be heard.

PLEASE TAKE FURTHER NOTICE that any objecting parties are required to attend

the Hearing and failure to appear may result in relief being granted upon default.

Dated: East Meadow, New York
January 22, 2019

ACKERMAN FOX, LLP
Attorneys for Movant

By: /s/ Neil H. Ackerman
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